

### R E M A R K S

Careful review and examination of the subject application are noted and appreciated. Applicants' representative thanks Examiner Patel for the indication of allowable matter.

### CLAIM OBJECTIONS

The rejection of claim 9 has been obviated by appropriate amendment and should be withdrawn.

### CLAIM REJECTIONS UNDER 35 U.S.C. §102

The rejection of claims 1-14 and 16-20 under 35 U.S.C. §102 as being anticipated by Kuo is respectfully traversed and should be withdrawn.

The rejection of claims 1-14 and 16-20 under 35 U.S.C. §102 as being anticipated by Groen is respectfully traversed and should be withdrawn.

Kuo discloses a digital-edge-rate control LVDS driver (Title). Groen discloses a programmable line driver (Title).

In contrast, claim 1 of the present invention provides an apparatus comprising a first plurality of parallel switches and a second plurality of parallel switches. The first plurality of parallel switches may be configured to each receive a multiphased data signal and control a first voltage on a first output pin. The second plurality of parallel switches may be configured to each receive a digital complement of the multiphased data signal and

control a second voltage on a second output pin. The first and second pluralities of parallel switches may be configured to provide rise time control of a differential waveform. Claims 19 and 20 provide similar limitations. Neither Kuo nor Groen disclose or suggest such a configuration.

In particular, the Examiner points to FIGS. 3 and 5 of Kuo as relating to both the claimed first plurality of switches and the claimed second plurality of claimed switches. However, upon a closer examination, the devices MA and MB of Kuo cannot be the claimed first plurality of switches since they receive different signals. In particular, the switch MA receives a signal A and the switch MB receives a signal B. In contrast, the claimed first plurality of switches are configured to each receive the multiphase data signal. Similarly, the switch MNA of Kuo receives the signal NA and the switch MNB receives the signal NB. In contrast, the claimed second plurality of switches are each configured to receive a digital complement of the multiphased data signal. Additionally, it is unclear whether the signal A and the signal NA of Kuo or the signal B and the signal NB of Kuo are multiphased signals, as presently claimed. As such, the presently claimed invention is fully patentable over Kuo and the rejection should be withdrawn.

Similarly, Groen also does not disclose or suggest the presently claimed invention. In particular, the Examiner makes the assertion that the transistors of the block 210 and the transistor 224 in FIG. 2 of Groen are the claimed first plurality of switches. However, it is unclear how the transistors in the block 210 and the

transistor 224 are configured to each receive a multiphase data signal, as presently claimed. The claimed first plurality of switches each receive the same multiphased data signal. However, in Groen, it does not appear that any of the switches in the group 210 or the switch 224 receive a common signal. Clarification is requested. Furthermore, the so-called second plurality of switches in the group 220 and the switch 226 have a similar problem when compared with the claimed invention. It is unclear where the digital complement of the multiphased data signal is received. Finally, it is unclear whether any of the signals in FIG. 2 of Groen are multiphased signals, as presently claimed. Furthermore, the assertion that the switches in Groen inherently work as the claimed invention is respectfully traversed. Inherency requires certainty of results, not mere possibility. See, e.g., *Ethyl Molded Products Co. v. Betts Package, Inc.*, 9 U.S.P.Q. 2d 1001 (E.D.Ky 1988). As such, neither Groen nor Kuo disclose or suggest each and every element of the claimed invention.

The allowable matter of claim 15 has been incorporated into newly presented claim 21.

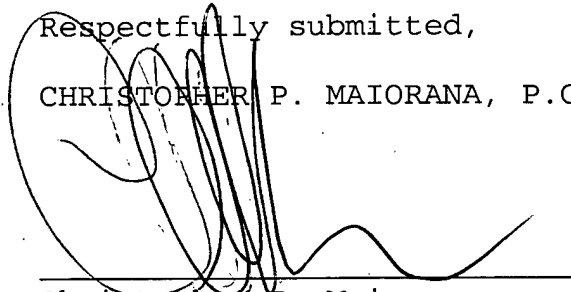
As such, the presently claimed invention is fully patentable over the cited references and the rejection should be withdrawn.

Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative at 586-498-0670 should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge Deposit Account No. 12-2252.

Respectfully submitted,  
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